

PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT PRIVILEGED
ATTORNEY WORK PRODUCT
JOINT DEFENSE PRIVILEGED

**OAG v. Poultry Industry
Joint Defense Meeting
(September 19, 2005)**

Agenda

1. Joint Defense Agreement
 - Parties
 - Execution
2. Initial Response to Complaint (Oct. 3)
 - Motions to Dismiss
 - Answers
 - Third Party Complaint
3. Arkansas AG
4. Potential Intervenors
 - Growers
 - Oklahoma / Arkansas Farm Bureau
 - Cherokee Nation
 - State of Arkansas
5. Challenge to Fee Agreement between OAG and Plaintiffs' Lawyers (Steve Jantzen)
6. Attorney General Edmondson as a Party (John Elrod)
 - Ability to Depose Edmondson?



7. Joint Defense Experts
 - Status of Retention
 - Work Commissioned or to be Commissioned
 - Gaps / Additional Experts Needed
8. Potential Preliminary Injunction Application
 - Timing?
 - Need for Discovery?
 - Roles of Experts in Opposing?
 - Testimony from Growers?
 - Testimony from Regulators?
 - Company witnesses?
9. Arkansas and Oklahoma Open Records Requests
10. Document Management Issues
 - Cost Sharing?
 - Uniform Document Identification System?
 - Shared Database of Searchable Documents?